

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW
YORK

CONSUMER FINANCIAL
PROTECTION BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

DECLARATION IN SUPPORT OF
MOTION TO FILE PRO HAC VICE
APPLICATION
UNDER SEAL

Civil Action No.
24-CV-40-EAW-MJR

TERRENCE M. CONNORS, ESQ. declares under penalty of perjury of the laws of the United States, pursuant to 28 U.S.C. §1746, that the following is true and correct:

1. I am an attorney admitted to practice law in New York State and this Court. I am a partner in the firm CONNORS LLP, attorneys for intervenor defendants, ANCHOR LAW FIRM, PLLC, BEDROCK LEGAL GROUP, BOULDER LEGAL GROUP, BRANDON ELLIS LAW FIRM LLC, CANYON LEGAL GROUP LLC, CHINN LEGAL GROUP, LLC, CLEAR CREEK LEGAL, LLC, CREDIT ADVOCATES LAW FIRM LLC, GREAT LAKES LAW FIRM LLC, GREENSTONE LEGAL GROUP, GUSTAFSON CONSUMER LAW GROUP, LLC, HAILSTONE LEGAL GROUP, HALLOCK AND ASSOCIATES, HALLOCK & ASSOCIATES, HARBOR LEGAL GROUP, HEATLAND LEGAL GROUP, LEIGH LEGAL GROUP,

PLLC, LEVEL ONE LAW, MEADOWBROOK LEGAL GROUP, MICHEL LAW LLC, MONARCH LEGAL GROUP, MOORE LEGAL GROUP, LLC, NEWPORT LEGAL GROUP LLC, NORTHSTAR LEGAL GROUP, OPTION 1 LEGAL, PIONEER LAW FIRM PC, ROCKWLL LEGAL GROUP, ROYAL LEGAL GROUP, SLATE LEGAL GROUP, SPRING LEGAL GROUP, STONEPOINT LEGAL GROUP, THE LAW FIRM OF DEREK WILLIAMS LLC, THE LAW OFFICE OF MELISSA MICHEL LLC, WHITESTONE LEGAL GROUP, AND WYOLAW LLC, in this action. As such, I am fully familiar with the pleadings and proceedings to date in this action.

2. Pursuant to No. 6 of this Court's Attorney Admission Petition form, I make this declaration in support of filing under seal the supplemental confidential statements required by paragraph 6 of the Pro Hac Vice Admission Petition of Timothy D. Elliott, Esq. and Emily A. Shupe, Esq.

3. Paragraph 6 of this Court's Attorney Admission Petition form provides that if the attorney seeking admission answers any of the questions in paragraph 6 in the affirmative, the applicant shall file a confidential statement under seal concerning those answers.

4. In order to comply with the directive in paragraph 6 of this Court's Attorney Admission Petition Form, and for the reasons stated in the accompanying memorandum of law, I respectfully request that the Court grant this motion that the aforesaid documents be filed under seal until further order of this Court.

5. I declare under penalty of perjury that the foregoing is true and correct.

Dated: Buffalo, New York
April 22, 2024

/s/ Terrence M. Connors
Terrence M. Connors